

REMARKS

Claims 33, 36-44, 48, 51-59, 63, and 64 are pending and under current examination.

Applicants have amended claims 38 and 48. Applicants respectfully traverse the rejections in the Office Action, wherein the Examiner took the following actions:

- (1) rejected claims 33, 36, 37, 39, 41-44, 48, 51, 52, 54, 56-59, and 63 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Pub. No. 2004/0066756 A1 ("Ahmavaara") in view of U.S. Patent No. 6,915,345 B1 ("Tummala");
- (2) rejected claims 38 and 53 under 35 U.S.C. § 103(a) as being unpatentable over Ahmavaara in view of Tummala, and in further view of U.S. Patent No. 6,421,339 B1 ("Thomas");
- (3) rejected claims 40 and 55 under 35 U.S.C. § 103(a) as being unpatentable over Ahmavaara in view of Tummala, and in further view of U.S. Patent No. 6,728,536 B1 ("Basilier"); and
- (4) rejected claim 64 under 35 U.S.C. § 103(a) as being unpatentable over Ahmavaara in view of Tummala, Thomas, and Basilier.

Rejection of Claims 33, 36, 37, 39, 41-44, 48, 51, 52, 54, 56-59, and 63 under 35 U.S.C. § 103(a):

Applicants request reconsideration and withdrawal of the rejection of claims 33, 36, 37, 39, 41-44, 48, 51, 52, 54, 56-59, and 63 under 35 U.S.C. § 103(a) as being unpatentable over Ahmavaara in view of Tummala.

The Office Action has not properly resolved the *Graham* factual inquiries, as required to establish a framework for an objective obviousness analysis. See M.P.E.P. § 2141(II), citing to *Graham v. John Deere Co.*, 383 U.S. 1, 148 USPQ 459 (1966), as reiterated by the U.S. Supreme Court in *KSR International Co. v. Teleflex Inc.*, 550 U.S. ___, 82 USPQ2d 1385 (2007). In particular, the Office Action has not properly determined the scope and content of the prior art, at least because the Office Action incorrectly interpreted the content of Tummala. Specifically,

Tummala does not teach or suggest what the Office Action attributes to Tummala. In addition, the Office Action has not properly ascertained the differences between the claimed invention and the prior art, at least because the Office Action has not interpreted the prior art and considered both the invention and the prior art as a whole. See M.P.E.P. § 2141(II)(B).

The Office Action admitted that Ahmavaara does not teach or suggest at least Applicants' claimed "simultaneously redirecting to all said supported visited networks the user credentials whose realm-identification component does not correspond to any realm identified in the routing table," as recited in claim 33 (emphasis added). See Office Action, p. 5. However, the Office Action alleged that Tummala teaches the above-quoted element at col. 11, ll. 40-64. See *id*.

Applicants respectfully disagree, and point out that the Office Action mischaracterized Tummala. For example, Tummala discloses a new "broker protocol" to overcome deficiencies of the old diameter base protocol. See Tummala, col. 6, ll. 1-18. The broker protocol uses a broker server "that responds back to a message routing request, providing information on how the peer may establish the service directly to the target host agent." Tummala, col. 6, ll. 18-21.

Tummala later explains this concept in more detail (with reference to Fig. 4). For example, when attempting to connect from a foreign network to a home network, Tummala teaches "[a]fter confirming that no SLA [*Service Level Agreement*] exists between the home network 310 and foreign network 340, the AAA [*Authentication, Authorization, and Accounting*] server 349 consults with the Broker AAA Server 375 in communication 380." Tummala, col. 10, ll. 54-57. Further, "[i]f the Broker AAA Server 375 is associated with the home network 310, the Broker AAA Server 375 sends a response 385 to the AAA server 349. The response 385 includes a Domain Discovery Answer (DDA) message that has a security mechanism generated to establish the SLA between the foreign and home networks." Tummala, col. 10, ll. 59-65. Finally, "[t]he above protocol messaging requires that the AAA Broker Server 375 be

contacted for all messages to unknown realms, in order to identify the Home Diameter server to use for a particular realm.” Tummala, col. 11, ll. 8-11. Therefore, Tummala teaches contacting the broker server for establishing an SLA for all messages to unknown realms.

Tummala further explains that

[w]hen the AAAP Server 349 receives the AMR message 410 *[which is shown in Fig. 7, not Fig. 4]*, it looks at the realm portion of the optional Destination-NAI or required User-Name AVP and compares it against its Destination Realm table. If there is no match, a broker referral table should be consulted. The broker table should contain the host name, IP address, and port number, and any needed security information to contact the broker system. The server may have a list of broker systems and could try them in a configured order until it gets a success. Failure to contact a system should lead to attempts to contact another broker as configured.

Tummala, col. 11, ll. 41-51. In summary, Tummala teaches adding a new server (*i.e.*, the broker server) which is to be contacted for establishing an SLA for all messages to unknown realms.

Tummala teaches contacting one broker server at a time until it achieves success. This is different from Applicants’ independent claim 33, which recites “simultaneously redirecting to all said supported visited networks,” and does not require adding additional servers.

Thus, the Office Action has neither properly determined the scope and content of the prior art, nor properly ascertained the differences between the prior art and the claimed invention. In view of the reasoning presented above, Applicants therefore submit that independent claim 33 is not obvious over Ahmavaara and Tummala, whether taken alone or in combination. Independent claim 33 should therefore be allowable. Independent claim 48, while of different scope, contains similar recitations to claim 33, and therefore should be allowable at least for the same reason as claim 33. Dependent claims 36, 37, 39, 41-44, 51, 52, 54, 56-59, and 63 should also be allowable at least by virtue of their respective dependence from base claim 33 or 48. Accordingly, Applicants request the withdrawal of the 35 U.S.C. § 103(a) rejection.

Rejections of Claims 38, 40, 53, 55, and 64 under 35 U.S.C. § 103(a):

Applicants request reconsideration and withdrawal of the remaining rejections of claims 38, 40, 53, 55, and 64 under 35 U.S.C. § 103(a) as being unpatentable over Ahmavaara in view of Tummala, and further in view of one or more of Thomas and Basilier.

As discussed above, Ahmavaara and Tummala, taken either alone or in combination, fail to disclose or suggest Applicants' claimed "simultaneously redirecting to all said supported visited networks the user credentials whose realm-identification component does not correspond to any realm identified in the routing table," as recited in claim 33 (and similarly in claim 48) (emphasis added).

Thomas fails to cure the deficiencies of Ahmavaara, Tummala, and Basilier. For example, Thomas is directed towards configuring packets for roaming calls on a foreign network. See Thomas, Abstract and Summary of the Invention. However, Thomas does not disclose or suggest at least Applicants' claimed "simultaneously redirecting to all said supported visited networks," as recited in claim 33 (and similarly in claim 48).

Basilier also fails to cure the deficiencies of Ahmavaara, Tummala, and Thomas. For example, Basilier discloses a method for transmitting specific information between a home and visiting network. See Basilier, Abstract and Summary of the Invention. However, Basilier does not disclose or suggest at least Applicants' claimed "simultaneously redirecting to all said supported visited networks," as recited in claim 33 (and similarly in claim 48).

For at least the above reasons, Applicants' independent claims 33 and 48 are not obvious over Ahmavaara, Tummala, Thomas, and Basilier, taken either alone or in any combination, and should therefore be allowable. Thus, dependent claims 38, 40, 53, 55, and 64 should also be allowable at least by virtue of their respective dependence from base claim 33 or 48. Accordingly, Applicants request the withdrawal of the remaining 35 U.S.C. § 103(a) rejections.

Conclusion:

Applicants request reconsideration of the application and withdrawal of the rejections. Pending claims 33, 36-44, 48, 51-59, 63, and 64 are in condition for allowance, and Applicants request a favorable action.

The Office Action contains statements characterizing the related art and the claims. Regardless of whether any such statements are specifically identified herein, Applicants decline to automatically subscribe to any statements in the Office Action.

If there are any remaining issues or misunderstandings, Applicants request the Examiner telephone the undersigned representative to discuss them.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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